

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
New Bern Division**

UNITED STATES OF AMERICA,	)	
	)	
v.	)	Crim. No. 2:10-CR-8-FL-4
	)	
	)	
RONALD SLEZAK <i>et al.</i>	)	
Defendant.	)	

**UNOPPOSED MOTION FOR MODIFICATION OF CONDITIONS OF PRE-TRIAL RELEASE**

COMES NOW, defendant Ronald Slezak, by and through counsel, and respectfully moves this Honorable Court to modify the conditions of pre-trial release to allow Mr. Slezak to periodically participate in hunting. In support thereof, counsel shows unto the Court the following:

1. Mr. Slezak is named as one of five co-defendants in the above-styled pending indictment, returned by the grand jury on April 16, 2010. Mr. Slezak is named in Counts One (Conspiracy) and Three through Six (False Statements) of the fifteen-count indictment.

2. On April 21, 2010, Mr. Slezak appeared before this Court and was placed on unsupervised pre-trial release without bond, subject to the standard conditions of release applicable to all defendants within the jurisdiction of U.S. District Court for the Eastern District of North Carolina. One of the standard conditions of release is the general prohibition against the possession of a firearm while under indictment.

3. In view of the foregoing standard condition, Mr. Slezak respectfully petitions the Court to permit him to participate in the following hunting seasons:

(1) turkey (October 23, 2010 through November 5, 2010; November 25, 2010 (one day); and November 29, 2010 through December 25, 2010) (shotgun);

(2) deer/bear (October 30, 2010 through January 1, 2011) (muzzle loader/shotgun/rifle);

(3) Spring Gobbler (April 9, 2011 through May 14, 2011) (shotgun).

4. The two firearms associated with the hunting seasons noted above are a Remington, model 870, .20 gauge pump shotgun, Encore single shot rifle with a .50 caliber muzzleloader barrel and a 7 mm fire barrel.

5. The firearms will be used only at a hunt club located in Emporia, Virginia. Mr. Slezak's son, Michael I. Slezak, a Chesapeake, Virginia police officer, has agreed to transport the subject firearms to the hunt club site at the beginning of each hunting season and to be responsible for locking and securing the subject firearms at the site at the conclusion of each hunt. Michael Slezak will maintain the gun lock keys at all times before and after each hunt. Upon the conclusion of the hunting season in May 2011, Michael Slezak will assume responsibility for transporting the subject firearms back to his residence in Chesapeake, Virginia. Michael Slezak is willing to provide an affidavit or other information that may be of assistance to the Court. It is anticipated that Mr. Slezak will be accompanied at all times either by his son and/or his hunting partner, David Keetch.

6. Mr. Slezak has held a hunting license for over 40 years and his completion of hunter safety coursework has been certified by the State of North Carolina.

7. In view of the non-violent nature of the charges and the fact that Mr. Slezak was granted unsupervised pre-trial release without bond, it is respectfully submitted that he poses no danger to the community by virtue of this proposed modification. The modification that he seeks is narrowly-tailored to allow for his participation in a long-standing hobby, confined to the property of a rural hunting club. Mr. Slezak will be accountable for his conduct at all times to his son, an active Chesapeake, Virginia police officer. Mr. Slezak understands and agrees that

his possession of the subject firearms will at all times be strictly limited to the foregoing hunting season and the hunting club property in Emporia, Virginia.

8. The undersigned counsel for Mr. Slezak have conferred with counsel for the government, Assistant U.S. Attorneys John Bowler and Jason Cowley, who advise that they do not oppose the instant motion.

WHEREFORE, based upon the foregoing, the undersigned respectfully moves this Honorable Court to grant the proposed modification of Mr. Ronald Slezak's conditions of pre-trial release. A proposed order is attached to this motion.

Dated: September 1, 2010

Respectfully submitted,

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## **CERTIFICATE OF SERVICE**

I hereby certify that on this 1st day of September, 2010, I electronically filed the foregoing Unopposed Motion for Modification of Conditions of Pre-Trial Release with the Clerk of the Court, on behalf of Defendant Ronald Slezak, using the Court's CM/ECF system, which will send notification of such filing to the following:

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